



Eric T. Kanefsky, **Senior Partner**
☎ 862.772.8149 ✉ eric@ck-litigation.com

August 7, 2024

VIA ECF

Honorable Georgette Castner
United States District Judge
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, N.J. 08608

Re: *Edwin H. Stier, Esq., as Wind Down Trustee for MLS Berkowitz Investments, LLC v. Diego Possebon, et al.*, Case No. 3:24-cv-04647-GC-RLS
Request for Extension of Time to Respond to Pre-Motion Letter (ECF No. 154)

Dear Judge Castner:

This law firm is co-counsel to the Plaintiff in the above-referenced case. On July 31, 2024, Defendant Banco PTG Pactual S.A. (“BTG”) filed a letter requesting a pre-motion conference concerning BTG’s anticipated motion to dismiss. *See* (ECF No. 154). Under Your Honor’s Judicial Preferences concerning Motions, Plaintiff’s response to BTG’s letter would be due today. We write respectfully to request an extension of time until August 13, 2024, to respond to BTG’s letter. BTG’s counsel has graciously consented to Plaintiff’s extension request.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'E-Kanefsky', with a long horizontal flourish extending to the right.

Eric T. Kanefsky, Esq., Senior Partner
Calcagni & Kanefsky LLP

cc (via ECF): all counsel of record